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16 *Attorneys for Plaintiff,*
17 **SWAMI SHRADDHANANDA SARASWATI**

18
19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**

21 **SWAMI SHRADDHANANDA**
22 **SARASWATI,**

23 **Plaintiff,**

24 **v.**

25 **CITY OF ALBANY, PACIFIC GAS &**
26 **ELECTRIC COMPANY, a California**
27 **registered domestic stock corporation,**
28 **FRANK L. YEE, MAY L. YEE, and DOES**
1-00, Inclusive,

Defendants.

AND RELATED CROSS ACTION

Case No. 3:17-cv-04940-MMC

STIPULATION AND [PROPOSED]
ORDER REGARDING THE FILING
OF A FIRST AMENDED
COMPLAINT BY PLAINTIFF

Plaintiff SWAMI SHRADDHANANDA SARASWATI (“Plaintiff”), Defendant CITY
OF ALBANY, Defendant PACIFIC GAS AND ELECTRIC COMPANY (“PG&E”), and
Defendants FRANK L. YEE AND MAY L. YEE, by and through their respective counsel, hereby

1 respectfully submit the following stipulation and proposed order regarding Plaintiff's stated
2 intention to file a First Amended Complaint:

- 3 1. Plaintiff seeks to amend her Complaint;
- 4 2. Pursuant to Rule 15(a)(2), Plaintiff has met-and-conferred with counsel for all
5 Defendants – to ascertain whether the opposing parties would consent, or if a motion
6 would be required – and has provided counsel a copy of the proposed First Amended
7 Complaint ("FAC"), with "redlined" changes;
- 8 3. Having had the opportunity to review the proposed FAC, counsel for the opposing
9 parties consent to the filing of Plaintiff's First Amended Complaint, a redlined copy
10 (reflecting the changes) of which is attached hereto, as **Exhibit 1**, and a standard (non-
11 redlined) copy of which is attached hereto, as **Exhibit 2**;
- 12 4. Defendants do not stipulate that any matter in Plaintiff's First Amended Complaint is
13 correct. Defendants only stipulate that Plaintiff does not need to file a motion for leave
14 to file the First Amended Complaint, and therefore Defendants stipulate that Plaintiff
15 may file said First Amended Complaint.
- 16 5. Based on the foregoing, the parties hereby respectfully stipulate to the filing of
17 Plaintiff's First Amended Complaint, and request that the Court grant the Order
18 below, permitting the filing of the FAC.

19 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

20
21 Respectfully Submitted,

22 Dated: November 12, 2018

LAW OFFICE OF SANJAY S. SCHMIDT

23 /s/ Sanjay S. Schmidt

24 By: SANJAY S. SCHMIDT
25 Attorneys for Plaintiff

26 Dated: November 12, 2018

DERBY McGUINNESS & GOLDSMITH LLP

27 /s/ Anthony E. Goldsmith

28 By: ANTHONY E. GOLDSMITH

Attorneys for Plaintiff

Dated: November 12, 2018

GOUGH & HANCOCK LLP

/s/ Gregory Read*

By: GREGORY READ

GAYLE L. GOUGH

SARA N. DUNCAN

Attorneys for Defendant

PACIFIC GAS AND ELECTRIC COMPANY

Dated: November 12, 2018

CLARK HILL LLP

/s/ Sara Allman*

By: SARA B. ALLMAN

MATTHEW T. BRAND

Attorneys for Defendant

CITY OF ALBANY

Dated: November 12, 2018

HARTSUYKER, STRATMAN & WILLIAMS-
ABREGO

/s/ Nairi Paterson*

By: NAIRI PATERSON

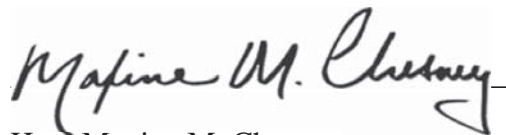
Attorneys for Defendants

FRANK L. YEE AND MAY L. YEE

[PROPOSED] ORDER

PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO
ORDERED. Plaintiff shall file her First Amended Complaint within 4-days of the date of this
Order.

Dated: November 19, 2018



Hon. Maxine M. Chesney
UNITED STATES DISTRICT JUDGE

* Pursuant to Rule 5-1(i) of the Civil Local Rules, the filer of this document hereby attests that concurrence in the filing of this document was obtained from each of the other Signatories.

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